Beth Israel Deaconess Medical Center BIDMC Policy Manual

Title: PRE-PLACEMENT SCREENING OF EMPLOYEES, MEDICAL STAFF, VOLUNTEERS, AND CONTRACT PERSONNEL

Policy #: PM-19

Purpose: To provide guidelines for pre-placement and infection control screening required for each Medical Center employee, student, volunteer, and other non-Beth Israel Deaconess employed health care worker/practitioner upon employment or practice at Beth Israel Deaconess Medical Center (BIDMC).

The health care environment presents health risks to employees and patients. In order to control and minimize these risks BIDMC requires all employees to be medically screened and to comply with the standards set forth in this document. These requirements follow national and state guidelines and regulations including but not limited to the Centers for Disease Control and Prevention (CDC), The Occupational Safety and Health Administration (OSHA), the Massachusetts Department of Public Health (MDPH) and The Joint Commission.

Policy Statement:

- Each new employee, physician, or volunteer at BIDMC shall be subject to the completion of a
 pre-placement health screening and comply with the infection control requirements for new
 employees established by the Medical Center. Failure to meet these requirements may
 result in corrective action up to and including termination from employment.
- 2. The pre-placement health screening includes a brief review of health and occupational history, occupation-related immunizations, job-specific medical surveillance, as applicable (such as animal worker surveillance), and a focused physical exam, if needed.
- 3. Employees will have the opportunity to request any accommodations needed in order to perform the essential functions of the job.
- 4. The infection control requirements for new employees include review of immunization against measles, mumps, rubella, varicella (chickenpox), tetanus, diphtheria, pertussis, influenza, and hepatitis B, as well as screening for tuberculosis infection or exposure. These requirements are discussed in more detail below.
- 5. Mandatory pre-placement health screening and satisfaction of the infection control requirements shall be completed prior to the employee's date of hire, except in situations where a condition (such as pregnancy) precludes completion of immunizations. If the employee has not completed the mandatory requirements, s/he may not start employment until these requirements are completed.
- 6. If an employee is made aware of a change in practice (DPH, BIDMC, CDC, etc) that affects his/her compliance with immunization standards, there will be a 30 day period to complete the request. If the employee does not adhere to request within 30 days, compliance leave of absence may be enacted by EMPLOYEE HEALTH and Human Resources.
- 7. If additional medical information is required to complete pre-placement health clearance, an employee may be placed on "medical hold" pending EMPLOYEE HEALTH receipt of the

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required documentation.

- 8. Each student or other non-Beth Israel Deaconess employed health care worker or practitioner planning to work or practice at Beth Israel Deaconess Medical Center shall provide Employee Health Services with written documentation of compliance with these infection control requirements.
- 9. This policy also covers observers, contracted personnel, traveler staff, temporary staff, agency staff, students, and all other staff not hired by BIDMC who are working in the medical center. Failure to comply with these requirements will prohibit the student or other non-Beth Israel Deaconess employee from working or practicing at Beth Israel Deaconess Medical Center.
- 10. All requests for **medical exemption** from any of the mandatory pre-placement screening and infection control requirements will be considered on a case-by-case basis. This may affect the employee's ability to work in certain areas of the institution. All other requests for exemption will be reviewed by Employee Relations.

Healthcare Worker Status Definitions:

The HCW assignment does not depend on the frequency of work assignment, but rather the nature of the work itself. Categories of Health Care Worker (HCW) are as follows:

- a. **HCW 1**: Regular, day to day contact; both face-to-face and hands-on.
 - **Examples**: physicians with active, daily patient contact at BIDMC, clinical nurses, phlebotomist, medical assistants, PFT tech, and x-techs.
- b. **HCW 2**: Regular, day-to-day contact; face-to-face only.
 - **Examples**: physicians who have daily contact with patients but not hands on; physicians with face-to-face, hands-on patient contact at BIDMC, even if occasionally; front desk receptionist, information desk receptionist, psychiatrist, resource specialists, interpreters, transporters.
- c. **HCW 3**: Regular provision of service in a patient care area.
 - **Examples**: Physicians who have face-to-face contact with patients at BIDMC, but only occasionally (no hands on patient contact at any point), unit coordinators, lead coordinator/supervisor, patient liaison, nutrition services, environmental services, registrars, information desks, and security.
- d. **IHCW (4):** No patient contact, but regular handling of specimens for testing and diagnostics.
 - **Examples**: Physicians in lab settings only; no patient contact at any point.
- e. NHCW (5): No patient contact.
 - **Examples**: Physicians who at no point see any patients at BIDMC.

Vaccinations:

The process for administering vaccines, obtaining serologies, and tuberculosis screening are outlined in separate EMPLOYEE HEALTH policies and procedures.

I. Required Vaccinations:

The following vaccines are required for HCW 1, 2, or 3. BIDMC employees who are unable to

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provide documentation of immunity will be offered serologic testing and/or immunization during their preplacement screen visit.

A. Measles, Rubella, Mumps

Staff shall provide documentation of immunity to measles, mumps, and rubella based on the following acceptable documentation of immunity:

- 1. Blood titer showing immunity to measles, mumps, and rubella, or
- 2. A written record, including month and year, of MMR vaccination:

Measles and Mumps: Documentation of two (2) doses of MMR vaccine given at least 28 days apart and beginning at >12 months of age.

Rubella: Documentation of one (1) dose of MMR vaccine at >12 months of age.

B. Varicella

Staff shall provide documentation of immunity to varicella (chickenpox) based on the following acceptable documentation of immunity:

- 1. Blood titer showing immunity to varicella
- **2.** Vaccination with two (2) doses of varicella vaccine.

C. Influenza Vaccination

- 1. HCW 1, 2, or 3, are required to have annual influenza vaccination.
- 2. Those who have received a flu vaccination elsewhere must provide valid documentation from the vaccinating office or institution. This may include a receipt from a retail pharmacy.
- 3. Those who are IHCW or NHCW status are required to:
 - a. Receive flu vaccination at BIDMC.
 - b. Provide documentation of flu vaccination elsewhere.
 - c. Formally decline by completing mandatory education on Flu Central on the BIDMC Portal and then completing a declination form.
- 4. Flu vaccination requirements are subject to change based on institutional requirements as well as state and federal mandates.

D. Medical Exemptions

Requests for medical exemption will be reviewed on a case-by-case basis. This may affect the employee's ability to work in certain areas of the institution. All other requests for exemption will be reviewed by Employee Relations. In order to request a medical exemption:

- HCW 1, 2, 3 must have their healthcare provider provide documentation explaining why the HCW is unable to receive a particular vaccine. For flu exemptions, a flu-specific medical exemption form must be submitted to Employee Health for review.
- Employees whose medical exemption request does not meet the standard for medical contraindication may be asked to meet with an EMPLOYEE HEALTH clinician, or Employee Relations team member. Standards for

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medical contraindications for required vaccines are derived from the Centers for Disease Control and Prevention.

II. Recommended Vaccinations

A. Tetanus Diphtheria Pertussis

- At the time of the pre-employment assessment by EMPLOYEE HEALTH, each new employee will be required to provide documentation of immunization for tetanus and diphtheria (Td) and/or tetanus, diphtheria, and pertussis (Tdap) vaccines.
- 2. Receipt of Tetanus, Diphtheria, and Pertussis (Tdap) vaccination is *strongly recommended*. Tdap vaccination will be offered to all staff who do not provide documentation of previous Tdap vaccination.
- 3. Employees who decline vaccination will be required to sign a declination statement. These employees will be advised that they are eligible to receive the vaccine at any time in the future if they change their mind

B. Hepatitis B

- Employees with direct patient contact and/or potential exposure to human blood, body fluids, tissues, and cell lines will be offered Hepatitis B vaccination and serologic testing per current CDC guidelines and OSHA requirements. This includes ALL research personnel, regardless of their current research activities.
- 2. Employees who decline vaccination will be required to sign an OSHA mandated declination statement.
- 3. Healthcare workers with active HBV, active HCV, or HIV infection will be counseled regarding personal health and job-related precautions. Necessary precautions and workplace accommodation will be reviewed by BIDMC's Review Panel for the Management of Healthcare Workers who are Infected with Hepatitis B, Hepatitis C, and/or HIV.

III. Tuberculosis Screening

- 1. Screening for tuberculosis will be conducted at the preplacement health screening for all employees and annually thereafter for HCW 1, 2, and 3. The following are required for clearance to begin work.
 - a. Two-Step testing requires:
 - i. Two negative TB skin tests done within one year of hire. One of the TB skin tests must be done within three months of hire.
 - ii. TB skin testing will be performed during the preplacement visit for those without adequate documentation.
 - b. If Interferon Gamma Release Assay (IGRA) testing results are available in lieu of TB skin testing, IGRA test results must be from within three months of hire.
 - c. Positive TB skin test results and/or positive IGRA testing will require evaluation for latent tuberculosis infection prior to clearance to begin work.
 - d. Employees who will be working for three months or less will only be required to have one TST done within six (6) months of beginning work at BIDMC.
- 2. Immunocompromised individuals

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- a. In the case wherein an individual has medical documentation of an immunocompromised state, testing with both IGRA and TST may be indicated to reduce the likelihood of a false-negative test result
- 3. Positive screening tests will require further evaluation prior to clearance

E. Medical Clearance for Specific Duties

Special screening procedures may be required for certain job types.

G. Non- Employees

- 1. Non-employees include:
 - a. Contractors (e.g., Maintenance)
 - b. Temporary agency and travel nurses
 - c. Students
 - d. Visiting clinicians and researchers

Non-employees shall provide medical documentation of compliance with all initial mandatory infection control screening requirements. If length of assignment at BIDMC is longer than three months, then the subject must meet all requirements that apply to BIDMC employees, regardless of patient contact level. If the length of assignment is less than three months and there is the possibility of patient contact or work in a patient care area, then a TB test within six (6) months of the start date is required. If length of stay is less than three months, and there is no patient contact or work in a patient care area, then no immunization record is necessary for clearance. All personnel who require an ID badge will report to EMPLOYEE HEALTH to receive clearance, regardless of work assignment or length of stay.

EMPLOYEE HEALTH will provide TB screening for these personnel, but other preemployment screening requirements, such as immunizations, must be completed by the non-employee's home employer/institution.

H. Non Compliance with Employment Screening Requirements

- All new employees must complete all employment screening requirements.
 EMPLOYEE HEALTH staff will notify Employee Relations of any new employee with outstanding requirements.
- The new hire will complete all outstanding requirements within the first five (5) days of start date. Any workforce members who decline any of the above vaccinations will be required to use their own earned time should they be placed off work in the event of a potential or confirmed exposure within the work environment.

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